

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

DOROTHY HOULIHAN, )  
Plaintiff, )  
v. ) C.A. No. 05-00194 JJF  
SUSSEX TECHNICAL SCHOOL DISTRICT, ) TRIAL BY JURY OF TWELVE  
SUSSEX TECHNICAL SCHOOL DISTRICT ) DEMANDED  
BOARD OF EDUCATION, SANDRA WALLS- )  
CULOTTA, individually, and in her official ) E-FILE  
capacity )  
Defendants. )

## **NOTICE OF RECORDS DEPOSITION**

**PLEASE TAKE NOTICE** that the undersigned attorney will take the records deposition of the records custodian of Dr. Jeanette Zaires\* on October 24, 2007 beginning at 10:00 a.m. in the offices of **WHITE and WILLIAMS LLP**, 824 North Market Street, Suite 902, Wilmington, Delaware 19801 (see attached Exhibit A).

\* *A subpoena duces tecum has been issued requesting a copy of all documents in your possession regarding Dorothy Houlihan.*

**NOTE:** Please note that personal appearance is waived if the requested records and the affidavit of substitute compliance are received in this office on or before the date of the scheduled deposition.

WHITE AND WILLIAMS LLP

BY: /s/ James S. Yoder  
James S. Yoder, Esquire  
(Bar No. 2643)  
824 N. Market Street, Suite 902  
P.O. Box 709

DATED: October 10, 2007

Wilmington, DE 19899-0709  
Phone: 302.467.4524  
Attorneys for Defendants Sussex County  
Vocational-Technical School District,  
Sussex County Vocational-Technical  
School District Board of Education, and  
Sandra Walls-Culotta

**CERTIFICATE OF SERVICE**

I, James S. Yoder, Esquire do hereby certify that on this 10<sup>th</sup> day of October 2007 two copies of the foregoing **Notice of Records Deposition** were served upon the following by First Class Mail, postage prepaid:

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